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June 24, 2015

**BY ECF AND E-MAIL**

The Honorable Valerie E. Caproni  
United States District Court, Southern District of New York  
500 Pearl Street  
New York, New York 10007  
E-mail to [CaproniNYSDChambers@nysd.uscourts.gov](mailto:CaproniNYSDChambers@nysd.uscourts.gov)

Re: Cynthia Chaffee et al. v. Farber et al., Index No. 15-cv-04262 (VEC)(JLC)

Dear Judge Caproni:

The parties are writing to ask the court to extend all Defendant's time to answer by thirty days.

Defendants have asked to extend their time to answer by thirty days because Defendants have not yet retained counsel or only recently retained counsel.

There has been no previous request for an extension.

All parties consent to the extension.

If the court grants this application, Defendants Ehrlich, Heiberger & Associates, P.C. and Farber's time to answer would be extended to August 3, 2015. Defendant Daniels, Norelli, Scully & Cecere's time to answer would be extended to August 6, 2015.

Respectfully submitted,

Manhattan Legal Services, Inc.  
Attorneys for Plaintiff  
1 W. 125<sup>th</sup> St., 2<sup>nd</sup> Fl.  
New York, NY 10027  
[mmccune@MLS.LS-NYC.org](mailto:mmccune@MLS.LS-NYC.org)  
646-442-3143 (Telephone and Fax)  
By: /s/ Mary McCune, of Counsel (MM3298)